

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

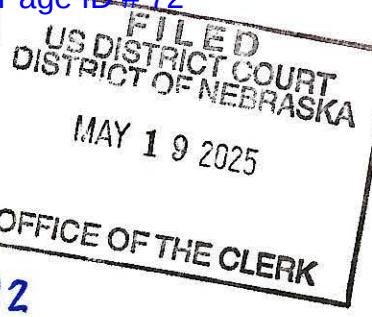
UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN MANUEL GOUVEIA-AGUILERA
and ALFREDO PINTO-MENDOZA,

Defendants.



8:25CR 112

INDICTMENT

18 U.S.C. § 371
18 U.S.C. § 2113(a) and 18 U.S.C. § 2
18 U.S.C. § 1030(a)(4), (b), & (c)(3)(A)

The Grand Jury charges that:

COUNT I**CONSPIRACY TO COMMIT BANK BURGLARY**

From on or about March 1, 2025, and continuing through on or about May 1, 2025, in the District of Nebraska and elsewhere, the defendants, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit acts and offenses against the laws of the United States, namely to enter or attempt to enter a building used in whole or in part as a bank whose deposits were then insured by the Federal Deposit Insurance Corporation and by the National Credit Union Administration Board, with the intent to commit a larceny, in violation of Title 18, United States Code, Section 2113(a), and took overt acts in furtherance of the conspiracy.

Overt Acts

In furtherance of the conspiracy and to effect its objects, at least one of the conspirators committed at least one of the following acts:

1. From on or about April 5, 2025, and continuing through on or about April 6, 2025, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-

MENDOZA, and other individuals known and unknown to the Grand Jury, traveled to the Baker Boyer Bank at 1530 Plaza Way in Walla Walla, Washington wherein they opened the Automated Teller Machine (hereinafter "ATM") on the bank premises using an ATM barrel key and removed the ATM's hard drive and installed a different hard drive carrying malware to carry out a jackpotting scheme. A jackpotting scheme is a type of cyberattack where criminals exploit vulnerabilities in ATMs to force them to dispense cash without debiting an account. JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, obtained \$93,480 from this jackpotting.

2. From on or about April 5, 2025, and continuing through on or about April 6, 2025, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, traveled to the Baker Boyer Bank at 1931 E Isaacs Ave. in Walla Walla, Washington wherein they opened the ATM located on the bank's premises using an ATM barrel key to access the computer system within the ATM to install hard drives and/or malware to carry out an ATM jackpotting scheme. JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, obtained \$60,640 from this jackpotting.
3. From on or about April 5, 2025, and continuing through on or about April 6, 2025, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, traveled to the Baker Boyer Bank at 32- N Columbia Street in Milton-Freewater,

Oregon, wherein they opened the ATM located on the bank's premises using an ATM barrel key to access the computer system within the ATM to install hard drives and/or malware to carry out an ATM jackpotting scheme. JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, obtained \$43,920 from this jackpotting.

4. On or about April 27, 2025, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, traveled to the North Platte Union Pacific Employees Credit Union in North Platte, Nebraska wherein they attempted to open the ATM on the credit union's premises using an ATM barrel key in order to remove the ATM's hard drive to install hard drives and/or malware to carry out an ATM jackpotting scheme.

All in violation of Title 18, United States Code, Section 371.

COUNT II
ATTEMPTED BANK BURGLARY

On or about April 27, 2025, in the District of Nebraska, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as the North Platte Union Pacific Employees Credit Union in North Platte, Nebraska, a credit union whose deposits were then insured by the National Credit Union Administration Board, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT III

CONSPIRACY TO ACCESS A PROTECTED COMPUTER

From on or about March 1, 2025, and continuing through on or about May 1, 2025, in the District of Nebraska and elsewhere, the defendants, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, conspired to knowingly and with intent to defraud accessed a protected computer without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A) and 2.

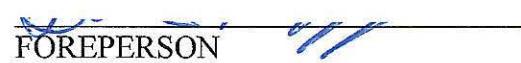
COUNT IV

ATTEMPTED ACCESS OF PROTECTED COMPUTER

On or about April 27, 2025, in the District of Nebraska, the defendants, JUAN MANUEL GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and other individuals known and unknown to the Grand Jury, knowingly and with intent to defraud accessed and attempted to access a protected computer, to wit: the computer system contained within the ATM at the North Platte Union Pacific Employees Credit Union in North Platte, Nebraska, without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A) and 2.

A TRUE BILL.


FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.



SEAN P. LYNCH, #25275
Assistant U.S. Attorney